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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA)	CASE NO. CR 14-00651 TEH
)	
v.)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME FROM OTHERWISE
LUIS GONZALO CAUICH CARBAJAL,)	APPLICABLE SPEEDY TRIAL ACT
)	CALCULATION
Defendant.)	

STIPULATION

IT IS HEREBY STIPULATED by the parties, through undersigned counsel, that:

1. The parties were originally scheduled to appear before the Court on August 31, 2015 at 2:30 p.m. for a status hearing. Due to a scheduling conflict, the government requested the parties reschedule the August 31, 2015 date. The parties agreed to stipulate to a continuance of the matter, with time excluded for effective preparation of counsel, to allow defense counsel to review discovery.

2. Accordingly, the parties' discussed rescheduling this matter to September 14, 2015 at 2:30 p.m., with the understanding that the parties would submit a Stipulation and Proposed Order excluding time.

3. The parties now formalize their request for a continuance of this matter to September 14, 2015 at 2:30 p.m. for a further status conference, and respectfully submit and agree that the period from

August 31, 2015 through and including September 14, 2015 should be excluded from the otherwise applicable Speedy Trial Act computation because the continuance is necessary for effective preparation of counsel, taking into account the exercise of due diligence. Specifically, the time requested for exclusion will allow defense counsel to review discovery.

IT IS SO STIPULATED.

DATED: August 20, 2015

MELINDA HAAG
United States Attorney

/s/
MICHAEL MAFFEI
Assistant United States Attorney

DATED: August 20, 2015

/s/
GABRIELA BISCHOF
Counsel for the Defendant

PROPOSED ORDER

Based upon the above-described Stipulation, THE COURT FINDS THAT the ends of justice served by granting a continuance from August 31, 2015 through and including September 14, 2015 outweigh the best interest of the public and the defendant in a speedy trial, and that failure to grant such a continuance would unreasonably deny the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.

Accordingly, THE COURT ORDERS THAT:

1. The parties shall appear before the Court on September 14, 2015 at 2:30 p.m. for further status conference.

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1 2. The period from August 31, 2015 through and including September 14, 2015 is excluded
2 from the otherwise applicable Speedy Trial Act computation, pursuant to 18 U.S.C. § 3161(h)(7)(A) &
3 (B)(iv).

4 IT IS SO ORDERED.

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6 DATED: 08/25/2015

